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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 GREGORY ALEXANDER,

14 Defendant.
15
16 _____

No. CR 09-719 EMC

STIPULATION and [PROPOSED]
ORDER TO CONTINUE STATUS
CONFERENCE

Date: September 28, 2011

Time: 2:30 p.m.

Court: The Honorable Edward M. Chen

17
18 Undersigned counsel stipulate as follows:

- 19 1. A status conference is currently scheduled in this matter on September 28, 2011 at
20 2:30 p.m. The purpose of the status conference is to advise the Court as to the
21 status of a potential disposition of the case;
- 22 2. The parties hereby advise the Court that the government has made an official offer
23 to Mr. Alexander, and the parties are conferring over some specific terms of the
24 offer. One of the outstanding issues is whether or not a restitution amount is
25 appropriate, and the government needs to provide additional discovery to the
26 defense in this vein. The defense also needs additional time to review that
27 discovery. The government is still waiting for the aforementioned discovery from
28 the USCF and cannot move forward with Mr. Alexander until such discovery is
received from the organization;

1 requested continuance would deny defense counsel the reasonable time necessary for effective
2 preparation of a defense. Accordingly, the Court will exclude the time period of September 28,
3 2011 through October 26, 2011 from the Speedy Trial calculation, and finds that the ends of
4 justice served by granting the requested two-week continuance outweighs the best interest in the
5 defendant and the public in a speedy trial.

6 18 U.S.C. § 3161(h)(7)(A) and (B)(iv)

7
8 IT IS SO ORDERED.

9 9/28/11

10 DATED: _____

11 THE HONORABLE
12 UNITED STATES JUDGE

